

**UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:     MARK MICHAEL REED

Debtor(s)

JACK N. ZAHAROPOULOS

CHAPTER 13

CHAPTER 13 TRUSTEE

Movant

vs.

CASE NO: 1-21-00801-HWV

MARK MICHAEL REED

Respondent(s)

**TRUSTEE'S MOTION TO DISMISS CASE**

AND NOW, on October 12, 2021, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, by and through his attorney James K. Jones, Esquire, and respectfully represents the following:

1.   A Plan was filed on May 10, 2021.
2.   A hearing was held and an Order was entered on August 11, 2021 directing that an amended plan be filed within thirty (30) days.
3.   As of the date of this Motion, an amended plan has not been filed.
4.   The delay in filing a confirmable plan in this case is prejudicial to creditors.

WHEREFORE, your Trustee respectfully requests your Honorable Court dismiss the case upon the basis that Debtors have failed to propose a confirmable plan.

Respectfully submitted,

s/ James K. Jones, Esq.

Id: 39031

Attorney for Trustee

Jack N. Zaharopoulos

Standing Chapter 13 Trustee

Ste. A, 8125 Adams Drive

Hummelstown, PA 17036

Ph. 717-566-6097

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CHAPTER 13

Debtor(s)

JACK N. ZAHAROPOULOS  
CHAPTER 13 TRUSTEE  
Movant

CASE NO: 1-21-00801-HWV

**NOTICE**

NOTICE IS HEREBY GIVEN that Jack N. Zaharopoulos, Standing Chapter 13 Trustee for the Middle District of Pennsylvania has filed a Motion to Dismiss for failure to file a confirmable Chapter 13 Plan.

YOU ARE HEREBY NOTICED that a hearing has been scheduled on this matter for:

Ronald Reagan Federal Bldg  
Bankruptcy Courtroom, 3rd Floor  
228 Walnut Street  
Harrisburg, PA 17101

Date: November 24, 2021

Time: 09:35 AM

Any objection or response filed must be filed with the Clerk, U.S. Bankruptcy Court and served on the Chapter 13 Trustee.

Jack N. Zaharopoulos, Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
Phone: (717) 566-6097  
Email: [info@pamd13trustee.com](mailto:info@pamd13trustee.com)

Dated: October 12, 2021

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IN RE: MARK MICHAEL REED

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MARK MICHAEL REED

CASE NO: 1-21-00801-HWV

Respondent(s)

**CERTIFICATE OF SERVICE**

I certify that I am more than 18 years of age and that on October 12, 2021, I served a copy of this Motion to Dismiss, Notice and Proposed Order on the following parties by 1<sup>st</sup> Class mail from Hummelstown, PA, unless served electronically.

DAWN MARIE CUTAIA, ESQUIRE  
115 EAST PHILADELPHIA STREET  
YORK, PA 17401-

Served electronically

United States Trustee  
228 Walnut Street  
Suite 1190  
Harrisburg, PA 17101

Served electronically

MARK MICHAEL REED  
1812 RED WING LANE  
DOVER, PA 17315

Served by 1<sup>st</sup> Class Mail

I certify under penalty of perjury that the foregoing is true and correct.

Date: October 12, 2021

Respectfully,  
Vickie Williams  
for Jack N. Zaharopoulos, Trustee  
Suite A, 8125 Adams Dr.  
Hummelstown, PA 17036  
Phone: (717) 566-6097  
eMail: [info@pamd13trustee.com](mailto:info@pamd13trustee.com)

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Debtor(s)	CHAPTER 13
JACK N. ZAHAROPOULOS	
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MARK MICHAEL REED	CASE NO: 1-21-00801-HWV
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**ORDER DISMISSING CASE**

Upon consideration of the Trustee's Motion to Dismiss, it is hereby Ordered that the above-captioned bankruptcy be and hereby is dismissed. The Court retains jurisdiction to rule on any timely filed fee application.